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16  
17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**

20  
21 TIFFANY RUFFA, KATHRYN CANFIELD,  
and ISIDORE NIYONGABO, on behalf of  
22 themselves and all others similarly situated,

23 Plaintiffs,

24 v.

25 SOCIETY FOR HUMAN RESOURCE  
MANAGEMENT,

26 Defendant.  
27  
28

**Case No. 4:21-cv-05549-DMR**

**STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL COMPLAINT**

Complaint Filed: July 20, 2021

Current Response Date: January 10, 2022

New Response Date: March 15, 2022

1 Plaintiffs Tiffany Ruffa, Kathryn Canfield, and Isidore Niyongabo (“Plaintiffs”) and  
 2 Defendant Society for Human Resource Management (“Defendant”), by and through their  
 3 respective counsel, jointly stipulate to extend the time for Defendant to respond to the Complaint  
 4 from January 10, 2022 to March 15, 2022.

5 This stipulation is made in good faith and not for the purpose of causing unwarranted  
 6 delay. Good cause supports the extension because (i) only two prior extensions have been  
 7 obtained, pursuant to ongoing settlement discussions, (ii) the Parties engaged in a Settlement  
 8 Conference on October 20, 2021, are continuing to engage in good faith settlement negotiations,  
 9 and have scheduled a mediation for March 1, 2022, and (iii) the Parties are complying with this  
 10 Court’s General Order 56 and the Court’s scheduling order in this case (Dkt. No. 5). Further,  
 11 pursuant to Local Rule 6-1(a), this extension will not alter the date of any event or any deadline  
 12 already fixed by Court order.

13 IT IS SO STIPULATED.

14 DATED: January 7, 2022

HOLLAND AND KNIGHT LLP

15 By: /s/ John H. Haney

16 Thomas E. Hill  
 17 Kristina S. Azlin  
 18 John H. Haney

*Attorneys for Defendant*

19 DATED: January 7, 2022

**DISABILITY RIGHTS ADVOCATES**

20 By: /s/ Emily Seelenfreund

21 Emily Seelenfreund  
 22 Meredith J. Weaver  
 23 Rebecca Williford

*Attorneys for Plaintiffs*

**ATTESTATION OF CONSENT**

24 I hereby attest that all other signatories listed, and on whose behalf the filing is submitted,  
 25 concur in the filing’s content and have authorized the electronic filing of this document with  
 26 their signature.

27 DATED: January 7, 2022

28 By: /s/ John H. Haney